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December 1, 2014

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**BY ECF**

Hon. James C. Francis  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re:**    *Bentley, et al. v. Dennison, et al.*, 11 CV 1056 (SAS)  
         *Betances, et al., v. Fischer, et al.*, 11 CV 3200 (SAS)

Dear Judge Francis:

This Office represents defendants in the above-referenced actions, and jointly submits this letter with counsel for plaintiffs in both Bentley and Betances. Pursuant to the Court's order at the August 7, 2014 telephone conference, the parties respectfully submit this status letter regarding discovery and settlement.

In Betances, discovery is proceeding. In September, in advance of filing their motion for class certification, plaintiffs took the depositions of two employees of the New York State Department of Corrections and Community Supervision ("DOCCS") who recorded and maintained data concerning individuals who were affected by administratively-imposed terms of post-release supervision ("PRS"). The depositions of the three named plaintiffs have been scheduled. In addition, the parties have answered each other's interrogatories and requests for the production of documents. Defendants have produced numerous responsive documents concerning plaintiffs and the putative class, including electronic databases concerning individuals affected by administratively-imposed PRS terms. Defendants' document production remains ongoing as this Office continues to receive documents responsive to plaintiffs' requests from DOCCS.

On November 13, 2014, Bentley was stayed pending further order by Judge Scheindlin. (See Dkt. #68.) Up until that point, discovery had proceeded, with the parties having answered each other's interrogatories and document requests, and defendants having produced numerous responsive

documents concerning the 21 plaintiffs, including electronic databases concerning individuals affected by administratively-imposed PRS terms.

The parties have not engaged in further settlement discussions since the August 7 conference, and do not believe that such discussions are appropriate at this time.

Respectfully submitted,

s/  
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cc: Matthew Brinckerhoff, Esq.  
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Joel Berger, Esq.  
*By ECF*